



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

**75 Hawthorne Street
San Francisco, CA 94105**

<http://www.epa.gov/region9/waste/enforcement/index.html>

Purpose: RCRA Compliance Evaluation Inspection
Facility: Survival Systems International

Location
Address: 34140 Valley Center Road
Valley Center, CA 92082

Mailing
Address: P.O. Box 1855
Valley Center, CA 92082

RCRA ID Number: CAD982508541
Date of Inspection: August 9, 2012
Time In/Time Out 9:00 a.m. -3.30 p.m.

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Rincon Band of Luiseño
Indian Representative(s): Tiffany Wolfe
Environmental Department
Program Coordinator
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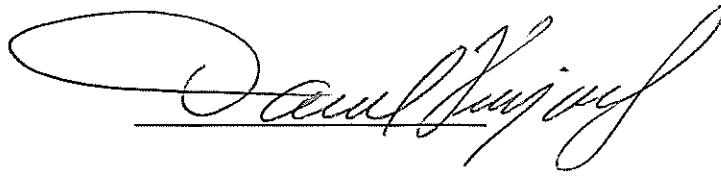
Facility Representative(s): George L. Beatty
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Report Date: September 21, 2012.

**Report Prepared
by:**

Daniel Fernandez

A handwritten signature in cursive script, appearing to read "Daniel Fernandez", is written over a horizontal line.

Introduction

On August 9, 2012 representatives of the U.S. Environmental Protection Agency (EPA) and Rincon Band of Luiseño Indians Environmental Department (RBLI-ED) conducted an unannounced hazardous waste management compliance evaluation inspection (CEI) of the Survival Systems International (SSI) facility located in Valley Center, California. The purpose of the inspection was to determine SSI's compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273 _Statutes and Regulations.

Facility Background

Company Web-Site	survivalsystemsinternational.com
Site History	The facility was opened in 1987 and occupies 6-acres.
Number of Employees	80
Hours of Operation	8:00 a.m. to 5:00 p.m., Monday - Friday
Latitude/Longitude	33'.273389", -116'.954336"
Facility Operations	Survival Systems International manufactures fire retardant fiberglass rescue capsules for oil platforms; and ballistic foam used in military helicopters.
RCRA and Non-RCRA Hazardous Wastes Streams	Oily water (CA221), waste paints, thinners, alcohol, acetone & MEK (D001), sand blast grid (CA352), priming booth filters (CA352), polyurethane foam , paint/thinner contaminated rags (D001), and Universal Waste (fluorescent light tubs, monitors and batteries).
Generator Status	Small Quantity Generator ("SQG")
Compliance History	As identified in the EPA's databases, the facility has never been inspected by EPA.

Below is an aerial photograph of the facility site.



Process and Site Descriptions

Survival Systems International is divided in three section areas; Office Space, Survival Capsule Manufacturing, and Ballistic Foam Manufacturing.

Capsule Manufacturing Process

The capsule shell is manufactured buy spraying a gel coat onto a fiberglass laminate in a mold. Once the fiberglass has hardened, it is trimmed, separated from the mold and assembled. The engine, oxygen tanks, seats, ventilation system and all necessary equipment are installed in the bottom half of the shell prior to attaching the upper half of the shell. When the survival capsule/boat is finished, it is tested for structural integrity.



Ballistic Foam Manufacturing Process

Ballistic foam is polyurethane poured into rectangular molds and let to cure. When the foam has cured and solidifies, is removed from the molds and cut into the desired shapes.



On-Site Inspection

The on-site inspection portion of the CEI started at machine shop and ended at the facility's 180-day hazardous waste accumulation area.

1. Facility and Satellite Accumulation Areas

There were six hazardous waste satellite accumulation areas ("SAAs") observed at the facility, with a total of fourteen hazardous waste containers (two 30-gallon containers, eleven 55-gallon, one 10-gallon, and one square-yard-box).


The following table summarizes the potential violations observed during the on-site inspection portion of the CEI for all areas except the facility's 180-day waste storage area.

Observation	Photograph	Comments
<p>1. SAA outside the Cable Testing Area: Poly drum SAA with 55-gallon container not labeled with the words “Used Oil.”</p>	 <p>Photo# 8090008</p>	<p>The words “Used Oil” were added to the label during the inspection.</p>
<p>2. SAA outside the Priming Booth Building: 30-gallon container holding paint debris noted open.</p>	 <p>Photo# 8090017</p>	

2. 180-Day Waste Accumulation

The facility had one Waste Accumulation Area with a total of six 55-gallon containers of RCRA hazardous waste observed.

The following table summarizes the observations made during the walk-through portion of the facility’s waste accumulation area.

Observation	Photograph	Comments
3. 55-gallon container holding waste paint, in the 180-day waste area, was not labeled with accumulation start date (ASD).	 <p>Photo# 8090015</p>	The ASD was added to the label during the inspection.

Comments: Inspectors noticed, two 55-gallon containers holding RCRA hazardous waste in the 180-day storage area, with a 6/29/2011 ASD. According to the facility representative, the containers had just been transferred to the storage area, and they were in the process relabeling them.

The containers were properly labeled with the information missing during the inspection.

Record Reviewed

Record	Year(s)	Observation(s)
Manifests	Most recent 3 years	SSI was manifesting their HW shipments using their California Only HW number.
Land Disposal Restriction ("LDR") Notifications	"	
Contingency Plan (Business Plan)	Current	
SQG Training Records	Current	Reviewed

Comments: The facility had two ID numbers - a California only HW generator number, and a RCRA HW generator number. The facility was manifesting there HW shipments using their California only HW generator number, which is inappropriate. SSI must use the RCRA HW generator ID number (CAD982508541) when shipping HW for treatment, storage or disposal.

POTENTIAL VIOLATIONS
of
RCRA 40 CFR
Hazardous Waste Management Regulations

NO.	STATUTE OR REGULATION	REGULATION SUMMARY	FINDING(s)	FACILITY RESPONSE
1	40 CFR § 262. 21 (f)(7)(i)(A)	<p><i>(7)The instructions in the appendix to 40 CFR part 262 must appear legibly on the back of the copies of the manifest and continuation sheet as provided in this paragraph (f).</i></p> <p><i>(i) Manifest Form 8700-22.</i></p> <p><i>(A) The "Instructions for Generators" on Copy 6;</i></p> <p><i>(1) Generator must enter EPA ID#</i></p>	<i>The facility was using a California Only HW ID number and not the EPA ID number as required by the instructions in the manifest.</i>	
2	40 CFR § 265.173(a)	<i>A container holding RCRA hazardous waste must always be kept closed, except when it is necessary to add or remove the waste.</i>	<i>One open 30-gallon container holding paint contaminated waste was observed in SAA outside the Priming Booth Building</i>	
3	40 CFR § 279.22(c)(1)	<i>Used oil generators are subject to(c) Labels. (1) Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."</i>	<i>Poly drum with 55-gallon container was not labeled with the words "Used Oil," in the outside Cable Testing SAA.</i>	<i>The facility representative labeled the container with the words "Used Oil" during the inspection.</i>

NO.	STATUTE OR REGULATION	REGULATION SUMMARY	FINDING(s)	FACILITY RESPONSE
4	40 CFR §262.34(a)	<p>(a) Except as provided in subsections (c) and (d) of this section and section 66262.35, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or grant of interim status, provided that:</p> <p>(2) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.</p>	A 55-gallon container holding waste paint, in the 180-day storage area, was not labeled with accumulation start date (ASD).	The facility representative labeled the container during the inspection.

List of Attachments

1. Photograph Log

Photo Log & Pictures

(Survival Systems International)

Survival Systems International Photo Log

Photo Number	Description	Comments
P8100001	Business Card	
P8100002	Photo deleted by mistake	
P8100003	Helicopter Picture	
P8100004	Foam Picture	
P8100005	Upper Shell of Boat	
P8100006	Lower Shell of Boat	
P8100007	Container	
P8100008	Container not labeled wit the words "Used Oil"	
P8100009	Foam Block	
P8100010	Container not labeled with the RCRA waste codes	
P8100011	Container not labeled with the RCRA waste codes	
P8100012	Container not labeled with the RCRA waste codes	
P8100013	Container not labeled with the RCRA waste codes	
P8100014	Container not labeled with the RCRA waste codes	
P8100015	Container not labeled with the ASD	
P8100016	Container not labeled with the ASD	
P8100017	Open container	



P8090001



P8090003



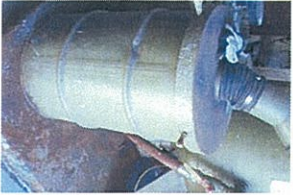
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P8090005



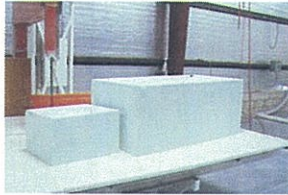
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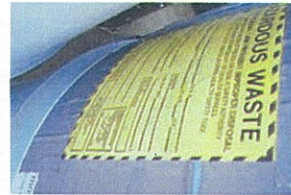
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P8090008



P8090009



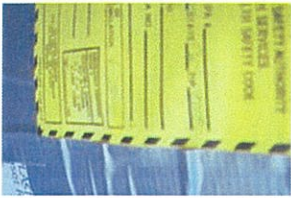
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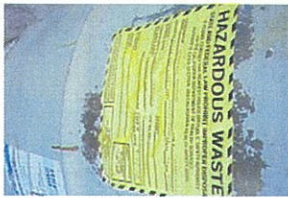
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P8090012



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P8090014



P8090015



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